

91 RF 8098

EG&G ROCKY FLATS

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EG&G ROCKY FLATS, INC
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November 15, 1991

91-RF-8098

Robert M Nelson, Jr
Manager
DOE, RFO

Attn F R Lockhart



000032876

COSTS ASSOCIATED WITH ADDITIONAL WORK SCOPE NEEDED TO OBTAIN EPA AND CDH
APPROVAL OF OPERABLE UNIT NO 6 (OU 6) WORK PLAN - JMK-0857-91

The purpose of this letter is to request project direction from DOE/RFO concerning an increase in the scope-of-work and associated costs requested by the Environmental Protection Agency (EPA) and the Colorado Department of Health (CDH) prior to approval of the Final Phase I RCRA Facilities Investigation/Remedial Investigation (RFI/RI) Work Plan for Operable Unit No 6 (OU 6)

DOE/RFO received notification from EPA on October 15, 1991 of the disapproval of the Final Phase I RFI/RI Work Plan for OU 6, Walnut Creek Priority Drainage CDH also notified DOE/RFO of disapproval of the same Work Plan in a letter dated October 11, 1991

EPA and CDH state in their review documents of the Final Work Plan that certain additional out-of-scope tasks must be included in the Work Plan before the agencies' approval DOE/RFO was given until December 15, 1991 to make the requested changes to the Final Work Plan or be subject to fines and penalties as stated in the Interagency Agreement (IAG)

Brent Lewis, until recently the DOE Project Manager, is cognizant of these requests from EPA and CDH However, Mr Lewis has informed EG&G that he will no longer be managing the QU 6 project. Robert Birk, the new DOE Project Manager, is cognizant of these requests from EPA and CDH EG&G Rocky Flats, Inc is requesting DOE direction as soon as possible

EG&G has estimated the costs that will be incurred by implementing the increases to the scope-of-work tasks requested by EPA and CDH The attached Table 1 presents the estimated costs of these tasks totaling \$2,660,000 EG&G assigns this dollar amount a price confidence level of 80 percent correct Therefore, estimated project costs could range from approximately \$2,220,000 to \$3,000,000 for this increase to the scope of-work

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IN REPLY TO LTR NO

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Page 2

Cost estimates do not include costs associated with the EPA and CDH contentions regarding ARARs for OU 6 DOE/RFO, EPA and CDH have not agreed upon Sitewide ARARs as of this date CDH states in their letter to EPA that they will comment further on the ARARs when DOE/RFO and the regulatory agencies arrive at a decision EG&G recognizes the ARAR issue is undecided and therefore outstanding at this time, however, guidance is requested on the overall scope and cost changes for OU 6

Please give this matter your urgent attention EG&G has been working with the DOE/RFO staff to resolve previous issues Please contact P S Bunge at extension 7121 or J T Ottensman at extension 3198 of Remediation Programs to discuss these issues further


J. M. Kersh, Associate General Manager
Environmental and Waste Management
EG&G Rocky Flats, Inc

JTO dmf

Orig and 3 cc - R M Nelson, Jr

Attachment
As Stated

cc
R H Birk - DOE, RFO



TABLE 1

ADDITIONAL SAMPLING/ANALYTICAL COSTS OU6

IHSS	Additional Work	Cost Basis	Total Cost
IHSS 141 (Sludge Dispersal Area)	- Pb/Am Analyses-Well	1 sample x \$1000	\$1,000
	- PCB/Pesticide Analyses Surface Samples	60 samples x \$1000	\$60,000
IHSS 142 (Ponds and Stream)	- 2" surface sample dry stream bed	32 samples x \$4,500 ¹	\$144,000
	- Original sediment sampling locations plus 4 along unnamed tributary	23 samples x \$4,500 ¹	\$103,500
IHSS 143 (Old Outfall)	- Additional Monitoring Well(s)?	2 x \$28,000 ²	\$56,000
	- Boring 5 feet into bedrock (stratigraphy) - no samples	11 x \$1,000	\$11,000
IHSS 156.2 (Soil Dump Area)	- Sediment & surface water samples in rills (10 each)	20 samples x \$4,500 ¹	\$90,000
	- 75 ft mesh centered grid 70 additional sampling points	70 borings x \$1,500	\$105,000
	- 210 additional samples (3 samples per hole) radionuclide analyses only	210 samples x \$1,500	\$315,000
	- TAL metals for samples	255 samples x \$1,000	\$255,000
	- Vadose zone monitoring		\$110,000 ³
IHSS 165 (Triangle Area)	- TAL metals surface soil samples on 100 foot grid plus rads and PCB/pesticides	54 samples x \$5,000 ⁴	\$270,000
	- Sediment and surface water sampling in rills (5 each)	10 samples x \$4,500 ¹	\$45,000
	- Vadose zone sampling		\$110,000 ³
IHSS 166 ()	- 2 additional monitoring wells	2 wells x \$28,000 ²	\$56,000
	- Vadose zone monitoring		\$110,000 ³

TABLE 1
(Concluded)

IHSS	Additional Work	Cost Basis	Total Cost
IHSS 167 (Spray Fields)	- One surface water sample	1 x \$4,500	\$4,500
	- Vadose zone monitoring (one at north and one at other two spray fields)	2 Areas	\$220,000 ²

Notes:

¹ \$1,000 sampling cost added to each additional sample.

² Monitoring wells; \$10,000 to install plus 4 sampling events at \$4,500 each (\$28,000).

³ Vadose zone sampling 10 sampling points x \$2,000 installation cost (\$20,000). 20 additional samples x \$4,500 analytical costs (\$90,000) for \$110,000 total.

⁴ Include \$1,500 sample collection costs.

⁵ Only partial report modification and reproduction